EDITOR'S NOTE: THIS SAMPLE PROGRAM MANUAL IS PROVIDED FOR USE IN TRAINING LIVESTOCK PRODUCERS AND AUDITORS IN PROPER APPLICATION OF THE NHTC PROGRAM STANDARDS. IT IS DESIGNED TO PROVIDE GUIDANCE ON APPROPRIATE LEVELS OF INFORMATION TO BE INCLUDED IN LIVESTOCK PRODUCERS' MANUALS. IT IS NOT INTENDED FOR USE AS A BOILERPLATE DOCUMENT AND SHOULD NOT BE DUPLICATED AND SUBMITTED FOR USDA APPROVAL.

Kismet Farms

Elmwood, Oklahoma

Non-Hormone Treated Cattle (NHTC)

Program Manual

May 2000

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Introduction

Kismet Farms is a small ranch located in the Oklahoma Panhandle area just north of Elmwood, Oklahoma. We are a cow/calf and stocker operations with approximately 400 head of mother cows. In addition to the calves we raise ourselves, we will usually purchase 100-200 stocker calves from other NHTC program producers to utilize the abundance of high-quality forage that comes from our organically managed fields and pastures. We farm 1000 acres in organic crop rotation with another 600 in native pasture. The farm has been in the Bates family since before statehood, and has survived the Dustbowl, depression, and various recessions through prudent and diversified farm management practices. The ranch is managed by owners Dale and Carol Bates, with the help of one full-time employee, 2 part-time helpers, and plenty of cooperative support from the best neighbors a family could ever ask for.

Reference Documents

The following documents are incorporated into this manual by reference:

FSIS Non-Hormone Treated Cattle Program – [most current revision]

Annex I, Food Safety and Inspection Service, Non-Hormone Treated Cattle Program Requirements, January 2000 – List of Prohibited Anabolic Compounds

LS Program Guidelines for Live Animal Production – [most current revision]

MGC Instruction 708 – Non-Hormone Treated Cattle Program – [most current revision]

Definitions and Acronyms

NHTC – Non-Hormone Treated Cattle

HGP – Hormonal Growth Promotants

Legal Status

Kismet Farms is privately owned by
Dale and Carol Bates
Hwy 270 North
Elmwood, Oklahoma 73934 [5(a)]

Kismet Farms Property Locations

Kismet Farms is located near Elmwood, Oklahoma. [See Exhibit – Map of Kismet Farms Property]

Farm Policies Regarding the NHTC Program

Management and employees of the Kismet Farms adhere to the following policies regarding the Kismet Farms NHTC Program:

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All activities of the Kismet Farms NHTC Program are conducted in compliance with the requirements of the USDA's Non-Hormone Treated Cattle Program.

Cattle may only be purchased from approved sources listed on the USDA's Internet Website located at http://www.ams.usda.gov/lsg/mgc/nhtc.htm. [4.4]

No hormonal growth promotants of any kind are fed, injected into, or otherwise administered to any animal on the Kismet Farms at any time. [4.1]

No hormonal growth promotants of any kind are stored on Kismet Farms property.

All cattle purchased by the Kismet Farms are accompanied by a signed affidavit and accompanying inventory documents which demonstrate a complete chain of traceability through USDA-approved NHTC Program participants to the farm where each animal was born. [4.3] [4.5]

All cattle maintained on Kismet Farms are individually identified as soon after birth or purchase as possible with a serial numbered Kismet Farms eartag. [4.2]

All medications used are controlled and stored according to the Kismet Farms NHTC Program manual.

The Kismet Farms livestock health program is maintained under the supervision of a licensed consulting veterinarian who is knowledgeable of the requirements of the USDA's NHTC Program and the Kismet Farms NHTC Program.

All persons employed by the Kismet Farms will receive annual training regarding the most current policies for the Kismet Farms NHTC Program. [4.6]

Any animal that becomes ineligible for the Kismet Farms NHTC Program for any reason is segregated, identified, and sold, with records retained which demonstrate final disposition.

Kismet Farms keeps complete records regarding each animal owned as described in **Document Control and Distributon.** [4.7][15.1]

Personnel Responsibilities 5(b)

Dale Bates: Owner

Responsible for all ranch operations. Conducts training of all employees. Leads management review meetings.

Carol Bates: Owner

Responsible for all NHTC Program record keeping and document control.

Francisco Chavez – Forman

Responsible for all daily operations, feeding, receiving, identification, and shipping. Routine on-ranch health care.

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Ron Mathers – Neighbor and USDA Approved NHTC Program supplier Conducts internal audits on exchange basis.

Steve Jacobs – Neighbor and USDA Approved NHTC Program supplier Conducts internal audits on exchange basis.

Dr. Mathew Earnest, DVM
Consulting Veterinarian for Kismet Farms

Cattle Buying Policy

Cattle are purchased only from suppliers appearing on the List of Approved NHTC Program Suppliers posted on the USDA's Internet website. [4.4]

Records of purchases are maintained in Kismet Farms records at the main office.

Cattle Receiving & Inspection Procedures

Upon receipt, all cattle purchased are held at main house corrals until all receiving inspections and processing is complete.

Cattle are processed according to Kismet Farms Receiving and Inspection Record and Checklist. Cattle in the receiving pen are visually appraised for possible treatment with HGP, with consideration to age, condition, and conformation.

Calves are processed through the cattle working chute and

- (1) vaccinated;
- (2) dehorned, if necessary;
- (3) castrated, if appropriate;
- (4) palpated for implants around the ears and tail head;
- (5) identified with an Kismet Farms ear tag in the right ear;
- (6) recorded on the Kismet Farms Receiving and Inspection Record and Checklist.

The previous individual identification number is recorded on the Receiving and Inspection Record and Checklist, along with the Kismet Farms NHTC ear tag number.

Completed worksheet is turned in to the main office for review, filing, and entry into database.

Receiving records are maintained at main office.

Calving Procedures and Records

Whenever possible, cows that are near calving are moved to the home place pastures. First calf heifers are moved into calving pens for observation until calves are born.

As soon after birth as possible, calves are identified with a Kismet Farms ear tag and the serial number recorded in the Kismet Farms Livestock Inventory Records. [6.1.3.4]

Animal Identification Procedures

<u>Eartags</u>. [See Exhibit] Kismet Farms uses a large, one-piece button tag, yellow in color and designed for single use, manufactured by RealTM Band and Tag Company. [6.1.2] [6.1.3] Tags say KISMET on the backside and are serially numbered with a large, 5-digit number beginning with 00001 on the front. [6.1.3.1]

Kismet Farms purchases tags in lots of 1,000 tags at a time, which is about a two-year supply. [6.1.3.2] Purchased tags are recorded in the tag inventory database upon receipt. The tag numbers are transferred to the Kismet Farms Livestock Inventory Records as they are used.

RealTM Band and Tag controls the tag numbers through their internal control program. RBT has agreed not to provide Kismet Farms tags to any other ranch and will maintain the dies and serial number sequence indefinitely. [6.1.3.3]

All calves are identified with a Kismet Farms eartag as soon after birth as possible. [6.1.1] Calves born in calving pens are identified before they are released to the main pastures with their mamas. Other calves are tagged the first time they are handled. [4.2] Calves that are received from other sources are identified with a Kismet Farms eartag during receiving inspection and processing. [6.2]

<u>Branding</u>. In addition to eartags, all calves that are born on the Kismet Farms are branded with a Kismet Farms brand on the left hip at the time they are weaned. [See Exhibit]. Calves that are purchased from other approved NHTC program sources are not branded.

Transfer of Animal Identification

All calves received are identified in accordance with USDA Non-Hormone Treated Cattle Program requirements. The method of identification is recorded on the Kismet Farms Receiving and Inspection Record and Checklist. The unique number of each calf received is noted on the checklist along with the number of the new Kismet Farms eartag. The original tag is left in the ear if possible, as backup identification. [6.3.1]

Records of transfer of identification are maintained in the home office records. [6.3.2]

Replacement of Lost Eartags

If a tag is lost, calves are matched up with their mother as they nurse in the pasture, then sorted out, and retagged. The number of the new tag is recorded next to the number of the old tag and shown as "replacement tag." [6.4.1]

If the Kismet Farms eartag on a purchased calf is missing, but the tag from the ranch of origin is still intact, the number of the original tag is cross-referenced to the Kismet Farms eartag number, a new tag installed and the number recorded next to the original Kismet Farms eartag number in the inventory records.

If the calf originated on the Kismet Farms and has a legible Kismet Farms brand and has remained under Kismet Farms control, a new tag is issued for the missing number. Calves are

inventoried at the next processing to determine the missing tag number and the new tag is recorded next to the original Kismet Farms eartag number.

If for any reason we can not be sure that the animal with the missing tag has not been exposed to treatment with HGP, we will remove the calf from the program as described in Control and Disposition of Nonconforming Animals (Red Tag Calves).

If a load of calves arrives at Kismet Farms, and one or more of the calves is missing an eartag, the receiving cowboys will check the manifest and determine, by the process of elimination what the calves' numbers should have been. Those numbers are entered into the receiving records as the assumed numbers of the calves.

If a load of calves arrives at the Kismet Farms, and one or more calves cannot be reconciled to the list of cattle arriving with the shipment, those calves are weighed and Red Tagged and held in the Red Tag pen until disposed of according to Red Tag Calf policies and procedures.

Traceability Policy

All calves on the Kismet Farms are traceable to their farm or ranch of birth. [7.1] All feeder cattle on the Kismet Farms ranch are home raised or purchased directly from the original farm or ranch of birth. Calves are not purchased thorough sale barns or other third parties.

All calves purchased must be accompanied by an original signature affidavit attached to a complete inventory of the load. All paperwork arriving with the load is inspected before cattle are unloaded.

Feeds and Feeding

<u>Feeds</u>. Cow/calf pairs are grazed on native pastures and crop rotation fields as shown on the Map of Kismet Farms Property Locations. Pasture is supplemented with alfalfa, legume/mix hay, corn, and corn ensilage raised on the farm.

Woodfin North, Woodfin South, Taylor North, Taylor South, Nancy's North, Nancy's South, Alvin's East and Alvin's West are all on rotation between sorghum feed, hard red winter wheat, and legume/mix pastures. Corn ensilage is raised on rotation with legume/mix pasture on the Home North and Home South, and Home Northeast fields. Weaned calves are backgrounded on these pastures until ready to be placed in the feed lot.

Winter wheat pasture and native grass pasture are supplemented by sorghum feed, corn, corn ensilage, and alfalfa/legume mix hay grown in the rotation fields.

<u>Supplements</u>. Mineral supplements are fed free choice in feeders in all pastures. The vitamin mineral supplements do not contain any HGPs.

Supplements are purchased from Shur-Feed in St. Joseph, MO. Our contact there is Dennis Oconnor who may be called for further information.

Copies of the following documents are included as exhibits with this manual:

- (1) Tag from the supplement. [11.1.2]
- (2) Letter sent to the suppler stating the requirement that no HGPs be included in the supplement or be stored or mixed in the same equipment as supplements containing any HGPs. [11.2.1]
- (3) A letter from the supplier stating that the Shur-Feed supplement we purchase from them contains no HGPs, and that, in fact, they do not process any feeds or supplements containing HGPs, nor are they approved by the FDA to do so. [8.2]

The following records are maintained at the Kismet Farms main office to demonstrate compliance with NHTC program feeding requirements:

- 1. Weight and type of feeds fed to each group of cattle by pasture.
- 2. Supplements fed to each group of cattle by pasture. [11.1.1]

Final Inspection & Shipping Procedures

Cattle are processed according to Final Inspection and Shipping Procedures Checklist [See Exhibit – Final Inspection and Shipping Procedures Checklist]. All sales or other transfer of the custody of cattle are recorded in Kismet Farms records in the main office. [12.2]

When cattle are ready to be shipped, they are moved to the shipping/receiving holding pens.

Calves are inspected for missing eartags, and if one is missing, a new one is applied. Records of any replaced tags are kept in the **Kismet Farms Inventory Records**.

A complete manifest of cattle to be shipped with the load is prepared. All cattle are traced at that time back to either Kismet Farms origin or their original ranch of origin. If the cattle were born on a farm or ranch other than the Kismet Farms, a copy of the original affidavit with which the calves are received is included with the load's paperwork. [12.1.1]

Cattle are examined and counted as they are loaded onto the truck. The truck is then sealed and the seal number recorded on the affidavit. [12.1]

The truck driver must read and sign the checklist before departing with the cattle. One copy of the checklist is provided to the driver, and one stored with the paperwork for the shipment.

If cattle must be unloaded prior to reaching destination for any reason, the driver will make any possible arrangements to prevent cattle from being commingled with HGP treated cattle. Driver will contact Kismet Farms main office by phone immediately to make arrangement for proper feeding of the animals if delay is expected to last for more than 8 hours. [12.1.2]

Upon arrival at the destination, the driver will present affidavits and shipping manifests to the proper authorities and arrange for proper segregation of animals prior to unloading cattle.

Issuing and Controlling Affidavits

An original blue ink signature affidavit is issued with each load of cattle, along with a detailed list of cattle included with the load. The affidavit [See Exhibit] meets all Food Safety and Inspection Service requirements. A hard copy and computer file of each affidavit issued is kept at the Kismet Farms main office. [9.1] [9.2] [9.3]

The following persons are authorized to sign NHTC program affidavits on behalf of Kismet Farms:

Dale Bates Carol Bates Francisco Chavez

[5(c)] [9.4]

Animal Health Program

The Kismet Farms' animal health program is maintained under the supervision of a licensed consulting veterinarian who is knowledgeable of all NHTC Program requirements. [13.2]

Cattle at Kismet Farms are never fed sub-therapeutic levels of antibiotics. Therapeutic levels of antibiotics are used when necessary to treat illness or injury at the discretion of the Ranch Forman, as advised by the consulting veterinarian.

Cattle owned or fed by Kismet Farms are never fed hormonal growth promotants of any kind. Hormonal growth promotants or similar compounds having anabolic effect are not used in any farm management practices.

Animal health care products and the occasions when they may be used are described in the attached Animal Health Care Products and Sources.

Control and Storage of Medications

Kismet Farms maintains a controlled supply of pharmaceutical items for occasional use as needed. These items are stored in the refrigerator in the farm office or in the medicine cabinet in the working shed next to the refrigerator. The attached exhibit, Animal Health Care Products & Sources, shows the trade name of the medicine, the active ingredient, and a brief description of the use of the medication. [13.1]

Criteria for Disqualifying Animals from NHTC Program

Cattle on the Kismet Farms are removed from NHTC Program eligibility for any of the following reasons.

- (1) Becoming separated and out of ranch control for more than 48 hours, if it is discovered that the animal may have been exposed to feed or feed supplements containing hormonal growth promotants.
- (2) Any purchased calf that looses a controlled eartag while outside of ranch properties, where positive Kismet brand identification can not be assured.

All neighboring farms have been notified of Kismet Farms' policies regarding non-hormone treatment of animals. None of these adjacent properties are used to graze or feed hormone treated cattle or other animals. Neighbors have agreed to notify the Kismet Farm's main office if any cattle get out and are found on their land, [8,3,1]

Control and Disposition of Nonconforming Animals (Red Tag Calves)

Calves disqualified for any reason are identified with a red eartag in each ear and placed in the home-use-only pen. These calves are removed from NHTC program inventory and shifted to the Segregation Pen inventory sheet. Calves from this lot are sold to local meat lockers or at the sale in Beaver, Oklahoma. The receipts for all calves sold are maintained in the Final Disposition of Red Tag Calves file. Red Tag Calves will not be included in any NHTC program shipments. [8.3]

Training

All new employees of Kismet Farms receive NHTC Program training as part of the new employee orientation. [See New Employee Orientation Training Record and Checklist]

All management personnel and employees of Kismet Farms attend annual NHTC refresher training. This training is conducted within 30 days of the annual management review to review existing procedures and any new policies. [14.1]

Copies of the Employee Orientation - Training Record and Checklist for each employee is maintained in the main office records. [14.2]

Document Control, Distribution, and Retention

The official version of the Kismet Farms NHTC Program Manual is posted as a controlled Adobe PDF document on the Kismet Farms website at http://www.KismetFarms.com. Copies of the document may be read on-line or printed to read, but may not be altered. The most current revision of each procedure and supporting document is identified by the issue date as shown on the Kismet Farms Document Control Masterlist at the front of the manual.

One current printed copy of the manual is maintained at each of the following locations:

- (1) Home office
- (2) Ranch foreman's pickup

All Kismet Farms NHTC Program records and historical copies of obsolete procedures are retained in a file in the main office for not less than 3 years. [15.4] Records are maintained on Microsoft Access database files in the Kismet Farms main office. [15.3] Records maintained for all animals include:

- 1. Birth, purchase or other acquisition
- 2. Feeding and rations received by the animal

- 3. Sales, transfers, deaths, or program disqualification
- 4. Final disposition [15.2]

Database files are readily accessible for easy review by USDA officials or other interested parties. [16.2] Data files are backed up on Friday of each week on a ZipDisk and stored in a secure location offsite. [16.1]

Complaints and Disputes

Dale Bates responds to written complaints personally, either by phone or in writing. Verbal complaints or disputes are recorded by letter to the file for the NHTC program. Complaints and disputes are responded to within 20 working days by letter or phone. The letter documenting the receipt of the initial complaint, along with the response letters are filed in the Complaints & Disputes file in the main office.

Internal Audits

Kismet Farms uses an internal audit exchange program with two neighboring ranches to ensure program policies and procedures are consistently followed. [17.1] Management representatives from these ranches, which are both NHTC approved suppliers, each visit Kismet Farms once each year to conduct internal reviews. At least two audits are conducted and recorded each year. Audits are conducted according to instructions on the **Internal Audit Checklist**. The findings of the internal audits are presented at a closing meeting at the conclusion of the audit and discussed with Kismet Farms management personnel. [17.3] Records of internal audits are filed in the main office. [17.2]

Management Review

Kismet Farms conducts a one-day management review meeting on the second Monday in January of each year. The purpose of the meeting is to review NHTC program procedures and to ensure all program requirements are consistently met. The meeting also serves as a forum for recommending and planning NHTC program improvements based on the findings of internal audits, customer comments, and overall program performance. The product of each of these meetings is a complete written summary (minutes) of issues discussed, conclusions drawn upon completion of the topics of discussion, and written plans of action for the coming year which address each objective discussed. A copy of the management review minutes is filed in the main office. Management review meeting minutes are considered confidential and shall not be released.

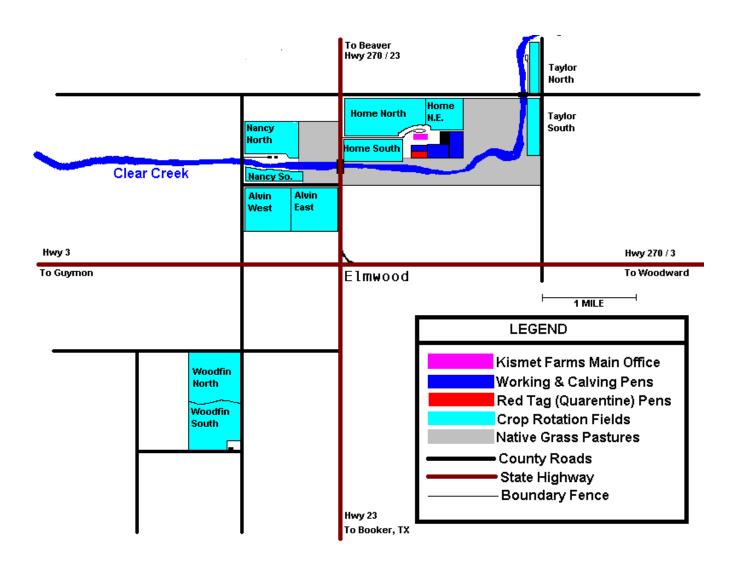
The findings of the management review meeting and any adopted recommendations are summarized and presented during the employee training to ensure employees have the latest information and procedures.

KISMET FARMS' DOCUMENT CONTROL MASTER LIST

This document control master list shows all documents which are used to form the Kismet Farms NHTC program management system. The official controlled version of this document is posted on the Kismet Farms website. Printed hardcopies are uncontrolled and must be verified as the most current issue by checking the Kismet Farms website before use.

NAME OF DOCUMENT	ISSUE DATE
NAME OF DOCUMENT Kismet Farms' NHTC Program Manual	May 1, 2000
Document Control Master List	June 14, 2000
Exhibit – Map of Kismet Farms Properties	May 5, 2000
Exhibit – Animal Health Care Products & Sources	•
Exhibit – Letter of Reference from Consulting Veterinarian	May 5, 2000
Exhibit – Sample Label from Feed Supplement	May 5, 2000
Exhibit – Sample Label from Feed Supplement	
Exhibit – List of Feeds and Sources.	May 5, 2000
Exhibit – Feed Supplier's Statement	May 5, 2000
Exhibit – Internal Audit Checklist	May 5, 2000
Exhibit – Management Review Meeting Minutes	May 5, 2000
Exhibit – Ear Tags	
Exhibit – Kismet Farms Brand	May 5, 2000
Exhibit – Affidavit	May 5, 2000
Exhibit – Kismet Farms Shipping Manifest	May 5, 2000
Exhibit – Training Checklist & Record	
Exhibit – Receiving Inspection Procedure & Checklist	May 5, 2000
Exhibit – Shipping Inspection Procedures & Checklist	May 5, 2000
Exhibit – Record of Complaints and Disputes	May 5, 2000
Standards and Government Reference Documents	
Livestock and Seed Program Guide 1 – Non-Hormone Treated Cattle Program	
Requirements for Live Animal Production	
MGC Branch Instruction 708	
EUREQ5 Export Requirements for the European Union	
Group A – Substances Having Anabolic Effect and Unauthorized Compound	ds4/10/2000

Map of Kismet Farms Properties - Elmwood, Oklahoma



Animal Health Care Products & Sources

Active Ingredient	Trade Name(s)	Source	Uses
	Vision 7-way	Dr. Earnest	Normal vaccination at
	vaccination		birth.
Sodium Selenite	Seletoc	Dr. Earnest	Prevent selenium
Vitamin E			deficiency. Given at birth
Vitamin A shot		Dr. Earnest	Prevent vitamin
			deficiency.
Vitamin D shot		Dr. Earnest	Prevent vitamin
			deficiency.
Ivermectin	Ivomec-Plus	Dr. Earnest	Parasite control
Brucellosis vaccine		Dr. Earnest	Prevent Brucellosis
Oxytetracycline HCL	Liquamycin LA-	Dr. Earnest	Treatment of pneumonia,
	200		shipping fever complex,
			pinkeye, foot rot, scours
			and wound infections
Oxytetracyline HCL	Biomycin 200	Dr. Earnest	To treat diseases caused
			by gram positive and
			negative bacteria,
			including pink eye.

Dr. Matthew C. Earnest, DVM East Highway 270 Slapout, Oklahoma, 73935 (580) 998-4356

DATE: January 6, 2000

TO: USDA

SUBJECT: Kismet Farms Non-Hormone Treated Cattle Program

This memo is provided at the request of Kismet Farms management with regard to my involvement with the review and management of their program.

I have provided veterinary services to the Kismet Farms ranch for the past 12 years. I am very familiar with their operations and the people who own the ranch. I am also familiar with the requirements of the USDA's Non-Hormone Treated Cattle program and have reviewed both the AMS guidelines and FSIS program requirements.

To the best of my knowledge, there are no hormonal growth promotants used in any of the feeds or farm management practices at Kismet Farms. None of the commercial preparations or medications used contain any of the classifications of compounds shown in Annex I of the FSIS program requirements.

Please feel free to contact me at my office or by pager at (800) 791-9999 if you have any questions.

SHUR-FEED STOCKER CALF FORMULA

GUARANTEED ANALYSIS:

Calcium (Ca)	12.0 MAX
Phosphorus (P)	
Magnesium (Mg)	
Potassium (K)	
Cobalt (Co)	40 ppm Min
Copper (Cu)	1000 ppm Min
lodine	80 ppm Min
Manganese (Mn)	3000 ppm Min
Selenium (Se)	25 ppm Min
Zinc (Zn)	
Vitamin Á	400,000 İU/lb Min
Vitamin D	40,000 IU/lb Min
Vitamin E	200 IU/lb Min
Vitamin B-12	20 mcg/lb Min
Niacin	80 mg/lb Min

INGREDIENTS:

Monocalcium Phosphate, Dicalcium Phosphate, Potassium Chloride, Sorghum Distillate, Dried Grains with solubles, Magnesium Oxide, Zinc sulfate, Copper sulfate, Cottonseed meal, Niacin, Calcium Pantothianate, Riboflavin, Vitamin B-12 supplement, Choline Chloride, Active Dry Yeast.

List of Feed Sources

Commodity/Product	Source
Hay	Home raised
Corn ensilage	Home raised
Whole shell corn	Home raised
Salt blocks with trace minerals	Beaver Equity Exchange
	Beaver, Oklahoma
Vitamin-mineral supplement	Shur-Feed
	St. Joseph, Missouri

Shur-Feed, Inc. P.O. Box 11122 St. Joseph, Missouri 43858 (817) 212-0998

Date: January 24, 1999

To: Whom It May Concern

From: Dennis Oconnor, Director of Technical Services

Shur-Feed, Inc.

Subject: Supplements Provided to Kismet Farms, Elmwood, Oklahoma

The purpose of this memo is to provide assurance regarding the vitamin and mineral supplement mixes sold to Kismet Farms, Elmwood, Oklahoma.

Shur-Feed, Inc. specializes in natural vitamin and mineral supplements for the livestock industry. All supplements sold by Shur-Feed are free of subthereputic levels of antibiotics and hormonal growth promotants. As additional assurance, we are registered to the ISO 9002 quality management standards for the production of natural livestock feeds, vitamins, and mineral supplements. All sales to our customers are recorded and traceable to the batch of product manufactured for the order, including the incoming raw materials used in the batch. All of our subcontracted suppliers are held to the same exacting standards we require of our own processes.

Any persons with questions or concerns regarding any feed sold to Kismet Farms may contact me at the above address.

Internal Audit Checklist

DIRECTIONS: Internal audits are to be conducted at least twice each year. Review each element on this checklist during the appropriate season. Any seasonal operations must be reviewed while actual program activities (processing, sorting, shipping, etc) are being performed. Audit to the Kismet Farms manual as well as the appropriate AMS guideline. Trace at least 3 complete document trails on loads of cattle that have been sold and delivered within the past 6 months. You may record your findings directly on a printed copy of this form, or record your findings electronically by typing them into this document. Answer each question "YES" or "NO" and provide a brief explanation for each "NO" answer. You will be provided with a copy of the Kismet Ranch NHTC manual for use during the audit. Please leave the manual and your copy of the completed audit form at the main office at the conclusion of the audit. Be prepared to discuss all aspects of the audit at the closing meeting. Results of the internal audit are confidential and should not be discussed with anyone except Kismet Ranch management. Thank you for your cooperation.

GENERAL AUDIT FORMAT TO FOLLOW:

- OBSERVE OPERATIONS (RECEIVING, PROCESSING, FEEDING, SHIPPING, ETC).
- REVIEW PAPERWORK IN THE OFFICE.
- 3. CHECK FEEDS AND MEDICAL SUPPLIES.
- REVIEW CATTLE AROUND THE RANCH.
- CALL THE VET TO DISCUSS HIS ROLE IN THE PROGRAM.
- 6. CALL THE FEED AND TAG SUPPLIERS TO DISCUSS THEIR ROLE IN THE PROGRAM.
- 7. IF YOU FIND PROBLEMS DURING THE AUDIT, DISCUSS THEM WITH THE RESPONSIBLE PERSON TO BE SURE YOU UNDERSTAND THE OPERATION.
- 8. ANSWER EACH QUESTION ON THIS FORM. FOR EACH ANSWER OF "NO" PROVIDE AN EXPLANATION.
- 9. HOLD A BRIEF CLOSING MEETING WITH THE MANAGERS TO DISCUSS YOUR FINDINGS.
- 10. LEAVE YOUR REPORT AND THE MANUAL AT THE CLOSING MEETING TO BE FILED WITH THE RANCH RECORDS.

ΑŢ	UDIT QUESTIONS
1.	Are Kismet Farms policies consistently followed?
_	
2.	Is the program manual properly maintained and available at locations stated in the manual?
3.	Are cattle kept only at locations shown in the manual?

4. Are cattle buying procedures followed?

Internal Audit Checklist – Page 3 of 5

Internal Audit Checklist – Page 4 of 5

Internal Audit Checklist – Page 5 of 5

Management Review Meeting Minutes

Date: January 10,2000

Meeting began at 10:00 a.m.

Attendees:

Dale Bates, Carol Bates, and Francisco Chavez. Matt Earnest, DVM, was also present for a portion of the meeting.

<u>Topics of Discussion:</u>

Internal audits. The findings of each internal audit were discussed and resolved.

- Several instances of not following procedures by the cowboys would be resolved by additional training to be held the afternoon of the last Friday in January.
- Some medicines not listed in the medications list have been added. This was determined to be an isolated incidence; no further preventive action will be conducted. However, Dr. Earnest said we should be sure to maintain the list as current and contact him before making any additions, particularly with regard to multiple ingredient medications that may include compound that have an anabolic effect and may be prohibited under the NHTC program.
- Two instances of not following retagging procedures correctly will be dealt with by specific training to be conducted at the next session. Remedial action (retagging properly) had already been accomplished.

Manual format. Carol discussed how the manual was designed and improvements needed. Was interested in making some of the changes automatically update when changes were made to the Access database. It was agreed that Carol would experiment with the formatting of the manual, but that any changes made would be discussed with the entire ranch staff before implementing them so that everyone would know where things were located and how they were to be used.

Access database design. Carol discussed how the current database is used to track each animal through the system. Each animal's information is directly entered into a spreadsheet in the database. Carol was interested in creating a direct data entry and query screen so that each animal would appear to have a complete separate record. This would be used by Francisco to enter each calf's data as it was processed or to make notes from the sick pen entries. It was agreed that Carol would prepare draft changes to the database, but that the entire staff would be trained on the changes before anything was permanently implemented.

Major program changes. It was agreed to allow the NHTC program at Kismet Farms to continue to operate as written to allow the system to be tested.

Next meeting. It was agreed to have a mid-year management review around the 4th of July to assess program progress.

Ear Tags

The ear tags shown below are the official means of animal identification for all NHTC program cattle kept on Kismet Farms. The tags are designed for single use and are destroyed when removed from the animal. The tag numbers and KISMET are permanently, mechanically applied to the tag by the manufacturer, Real Band and Tag Company. RBT has agreed in writing to provide tags identified with the word KISMET and this numbering sequence to Kismet Farms. The numbering sequence is also controlled by RBT and numbers will not be repeated.

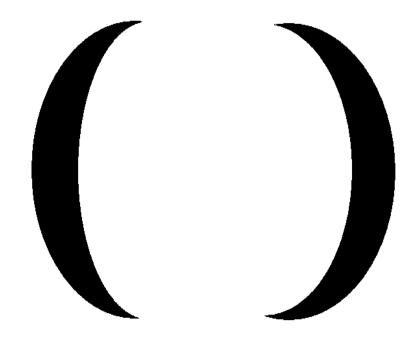




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Kismet Farms Brand

Kismet Farms brand – located on left hip of animal.



Serial Number: 000000001
NHTC Approval No.: NH0092BA
Date of Dispatch:
Timeframe Covered by Affidavit:
Total Number of Animals:

Kismet Farms Non-Hormone Treated Cattle Program Producer Affidavit

I, Dale Bates, am the present owner of the identified animals and have directly controlled or taken full responsibility for relevant practices applied in their raising¹. I do affirm that the animals covered by this certificate have never been treated or fed hormonal growth promotants (anabolic compounds) while under my control.

Dale Bates, Owner Kismet Farms Route 270 North Elmwood, Oklahoma 73934

Description of Animals (continued on attached sheet)				
Unique Identification from producer or feedlot (Ear Tag No., brand, etc.)	Sex of Animal (steer, heifer, bull)	Breed or Color Description	Age	Received with producer affidavit (list serial number and attach copy)
Transfer to: ð Slaughter l	Establishment (Es	t. No):		

Transfer to:	Ö Feedlot (NHTC No.):	
I certify tha	t all statements made herein are tr	ue to the best of my knowledge.
SIGNATUR	RE :	Date:
Printed Name a	and Title: Dale Bates, Owner, Kismet Farms	

WARNING: Persons willfully making false, fictitious, or fraudulent statements or entries are subject to fine or imprisonment or both as prescribed by Title 18 U.S. Code 1001.

¹ If the animals have been owned by or under control of other persons or premises, I am attaching a copy of the producer affidavit for each transfer of ownership.

Kismet Farms Shipping Manifest – Affidavit # 000023

Directions: List each animal to be included on load, including all required information. Attach this sheet to affidavit

and include with paperwork to go with shipment. File one copy in the main office. WT. KISMET # INCOMING # DESCRIPTION BRAND **NOTES** SEX 001208 BLACK W/F KISMET 652 001221 KISMET S 2 BLACK W/F 650 001207 BLACK W/F KISMET S 657 3 4 001209 BLACK W/F KISMET S 667 BLACK W/F 001226 KISMET S 645 5 6 001230 BLACK W/F KISMET S 657 001222 BLACK W/F KISMET 656 BLACK W/F KISMET S 001227 8 666 001201 BLACK W/F KISMET S 629 9 001229 BLACK W/F KISMET S 645 10 11 001223 BLACK W/F **KISMET** S 700 687 001202 BLACK W/F KISMET 12 S 13 001213 BLACK W/F KISMET 665 **KISMET** 14 001212 **BLACK W/F** 657 001214 KISMET 15 BLACK W/F S 655 16 001224 BLACK W/F KISMET S 652 S 001228 BLACK W/F **KISMET** 654 17 18 001211 BLACK W/F KISMET S 657 19 001306 BLACK W/F KISMET S 667 RETAGGED ON 3/5/99 OLD # 001187 BLACK W/F KISMET S 20 001225 659 KISMET S 21 001203 BLACK W/F 660 22 001210 BLACK W/F KISMET S 687 23 001219 **BLACK W/F** KISMET S 677 KISMET S 24 001204 BLACK W/F 675 25 001216 BLACK W/F KISMET S 657 26 001220 **BLACK W/F KISMET** 665 27 001217 BLACK W/F KISMET S 650 KISMET 28 001205 **BLACK W/F** S 650 29 001218 **BLACK W/F KISMET** 655 30 001206 BLACK W/F KISMET 654 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58

TOTAL WEIGHT

19807

59 60

Training Checklist & Record

Directions: Trainer will complete all learning activities with employee and obtain signature once employee has completed training. For new employees, conduct training during initial orientation before assigning any duties. For existing employees, conduct retraining each year during the month of January. Activities with an asterisk (*) need only be completed during initial training. Store signed copy of the completed checklist in the main office files.

- 1. Take a driving tour of ranch properties. Give brief history of ranch and point out areas of interest. During the tour, describe crop rotation programs in place for each site and the purpose of rotation programs. Discuss Kismet Farms commitment to the environment and sustainable agriculture. *
- 2. Give a brief history of Kismet Farms' involvement with the NHTC program. Discuss the pros and cons of the USDA's certification program and the basis for Kismet Farms' decision to participate in the program. *
- 3. Have employee read the NHTC program manual and discuss each section with them. Review each of the attachments and explain how they are to be used or completed. Show employee completed examples of each and where they are stored. *
- 4. Explain to the employee which records he or she will be expected to use and have them complete one copy of each form for practice. Review the form after it is completed and have the employee correct any errors. Explain the importance of accuracy and neatness. *
- 5. Review the list of anabolic compounds and give common examples of each type. Explain to the employee how these compounds are commonly used in conventional agricultural production and why these compounds must not be used at Kismet Farms. *
- 6. Review the minutes of the last management review meeting. Discuss changes to be implemented and the reason for the change. Show the employee copies of any forms that have been revised and show examples of how they are to be completed.
- 7. Discuss any areas for possible improvement regarding the employee's past performance in following Kismet Farms' NHTC program policies and discuss possible approaches toward ensuring consistent performance.
- 8. Answer any questions the employee may have regarding the Kismet Farms' NHTC program or any other ranch policy or procedure.

CERTIFICATION					
I have trained this employee according to the above checklist of activities and the employee has shown that they understand the content and objectives of the information presented.		I have received the above training as understand the content and objective presented.			
Trainer's Signature	Date	Employee's Signature	Date		

- 1. Obtain original affidavit before unloading truck.
- 2. If truck is sealed, record seal number on checklist.
- 3. Unload trucks at main house corrals. Check cattle as they are unloaded to be sure they have an eartag and that the tag is listed on the shipping manifest. If tag is missing, or calf is not on the manifest, segregate the calf in the west holding pen until status is determined.
- 4. If any eartags are missing, check the truck for the missing tag(s). Match up any tags with cattle missing eartags if positive identification can be established. If positive ID cannot be established, place a red tag in the calf and move the calf to red tag pen. Record red tag number on the receiving checklist and notify shipper of discounts to be applied.
- 5. Scan cattle for any unusually heavily muscled calves with consideration to age, condition, and frame size. Note tag numbers of suspect calves for closer examination when processing.
- 6. Process each calf through the chutes. If calves do not come with pre-vaccination assurances from the ranch of origin, vaccinate as required.
- 7. Palpate ears and tailhead area for possible implants. Identify any calf suspected to have been implanted or treated with HGPs with a red tag and move calf to red tag pen. Record red tag number on the receiving checklist and notify shipper of discounts to be applied.
- 8. Castrate and dehorn as appropriate.
- 9. Apply a Kismet Farms ear tag to the right ear of each calf and record the number below. Record the number in the "PREVIOUS ID #" section.
- 10. Turn in completed work sheets to the main office for review and filing.

Kismet Farms	IN.	HIC Program Mani	uai	Revised 05/05/00
DATE	TIMEAM PM			
	111V1		AWI TWI	
	,		1	
KISMET TAG#	PREVIOUS ID #	TYPE	SEX	NOTES
	<u> </u>		<u> </u>	<u> </u>

ATTACH ADDITIONAL SHEETS IF NEEDED

Shipping Inspection Procedures & Checklist

Move cattle to the holding pen the evening before they are due to ship during the cool part of the day. Make sure there is plenty of fresh hay and water. Keep cattle as quiet as possible.

Inspect cattle while they are in the pens to make sure they all have Kismet Farms ear tags and that there are no outward signs of illness. Move any sick or injured animals to the sick pens for examination and possible treatment.

After cattle are inspected, weigh the cattle individually and record the shipping weight for entry into the herd database. If any cattle are missing eartags and must be retagged, follow retagging procedures while the animal is confined in the scale lead-in chute.

Prepare the shipping manifest, listing each animal individually and including all information required by the manifest form. Note any retagged animals in the "NOTES" section of the manifest. Review the manifest to ensure each animal on the load is traceable to its place of birth. If any of the cattle are from ranches other than Kismet Farms, attach a copy of the incoming affidavit to the back of the shipping manifest. If for any reason an animal cannot be traced, move it to the red tag pen and do not ship it for an NHTC load.

Prepare the producer's affidavit according to the provided example.

AT TIME OF SHIPMENT:

Examine all trucks for cleanliness before loading.

If an outside carrier is used, explain the procedures for loading and unloading to the driver. Be sure they understand the importance of the shipping manifest and the affidavit. Instruct the driver regarding all shipping instructions and include a copy of the shipping procedures with their paperwork.

Examine the cattle as they are being loaded to be sure tags are still intact. Double check the manifest with the cattle numbers as they are loaded.

Seal the truck and record the seal on the shipping manifest and affidavit.

Check the paperwork folder to ensure the following items are included:

- 1. Original signature affidavit
- 2. Complete shipping manifest
- 3. Shipping instructions to the driver

SPECIAL INSTRUCTIONS TO DRIVER

If cattle must be unloaded in transit, try to ensure cattle are not commingled with HGP- treated cattle. Contact Kismet Farms main office if cattle will be delayed for more than 8 hours, to make arrangements for feed and water.

Present affidavits and manifest to proper personnel upon arrival at the destination. Do not unload cattle at destination unless the management is aware of the type of cattle being unloaded and has a pen prepared for NHTC program cattle.

I have read the above instructions and agree to comply:	DRIVER'S SIGNATURE AND DATE
The load accompanied by AFFIDAVIT #all USDA and Kismet Farms NHTC Program requirements.	has been properly prepared for shipment and meets
	Kismet Farms Representative

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COMPLAINTS & DISPUTES RECORD

DATE: April 23, 2000

CONTACTED BY: Farmland National Beef – Liberal, KS

Quality Control Director

CONTACT MODE: Phone call

RECEIVED BY: Dale

COMPLAINT: Found 2 injection site blemishes (shoulder) on load of cattle shipped

April 19, 2000. Wanted to be sure cattle had not received HGPs.

ACTION REQUESTED: None.

KISMET RESPONSE: Checked records and explained that blemish was from vaccine.

KISMET ACTION: Inform Forman of complaint and be sure injection sanitation

procedures are being followed.

DATE COMPLETED: April 23, 2000

FILE NAME: COMPLAINT FILE 4-27-00 DONATY